

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL LEPPEN,)	
Plaintiff,)	
)	
v.)	Case No. 24-cv-5046
)	
BENJAMIN JOHNSON,)	Honorable Steven C. Seeger
Defendant.)	


AGREED MOTION FOR ENTRY OF AGREED JUDGMENT

NOW COMES, the plaintiff, Michael A. Leppen (“Mr. Leppen”) by and through his attorneys, McFadden & Dillon, P.C., and defendant, Benjamin Johnson (“Mr. Johnson”), pro se, and for their Agreed Motion for Entry of Agreed Judgment states as follows:

1. On June 18, 2024, Mr. Leppen filed herein a Complaint against defendant, Mr. Johnson, alleging breach of contract. [Doc. #1]
2. Mr. Johnson was personally served with summons and the Complaint on June 24, 2024. [Doc. #7]
3. ~~Mr. Johnson filed his appearance herein on~~ has signed the attached Appearance.
4. Mr. Johnson acknowledges that he has no meritorious defense against the allegations of the Complaint and admits that he owes Mr. Leppen \$82,300.00.
5. The parties wish to minimize court costs and attorneys’ fees by way of entry of an Agreed Judgment Order against Mr. Johnson and in favor of Mr. Leppen for the full amount complained of - \$82,300.00. A proposed and signed Agreed Judgment Order is attached hereto as Exhibit A.

WHEREFORE, plaintiff, Michael A. Leppen and defendant, Benjamin Johnson, respectfully request that this Honorable Court enter the proposed Agreed Judgment Order in favor of Michael A. Leppen and against Benjamin Johnson in the amount of Eighty-two Thousand, Three Hundred Dollars (\$82,300.00), and grant such further relief as this Court deems just and proper.

Signed by:



5D3FC652B647492...

Michael A. Leppen, Plaintiff

Signed by:



543D68C9B4CEC42F...

Benjamin Johnson, Defendant

Respectfully Submitted,

/s/ Wendy Kaleta Gattone

Attorney for Plaintiff, Michael A.
Leppen

Wendy Kaleta Gattone (ARDC # 6226119)
McFadden & Dillon, P.C.
120 S. LaSalle Street, Suite 1920
Chicago, IL 60603
(312) 201-8300